

#### WALSH COLUCCI LUBELEY EMRICH & TERPAK PC

Jason B. Heinberg (703) 528-4700 Ext. 5417 jheinberg@arl.thelandlawyers.com

October 28, 2005

Via Hand-Delivery

Meghan Vandam Department of Planning and Zoning Planning Division 12055 Government Center Parkway, Suite 730 Fairfax, Virginia 22035

Re: Revision of Area Plans Review (APR) Nomination

Fairfax County Tax Map Reference: 101-3 ((1)) 28, 29B, 29C, 30, 30B, 30C, 31B,

31C, 32, 33; 101-3 ((9)) (1) 1-5, 500, 501, C1; 101-3 ((9)) (2) B.

Nominator: JPI Development, Inc.

Dear Ms. Vandam:

As you know, Planning Division staff has requested that the Nominator consolidate the two (2) APR nominations it previously submitted on property located within the land area identified as recommendations #3 and #6 of the Suburban Neighborhood Areas between the South County Center Community Business Center ("CBC") and the Woodlawn CBC, within the Richmond Highway Corridor area of the Area IV Comprehensive Plan. The Nominator agrees that consolidation of the two (2) nominations is appropriate. Accordingly, I have enclosed a revised APR nomination package reflecting the consolidation of the two (2) nominations into one (1) nomination encompassing the referenced Tax Map parcels. On behalf of the Nominator, I hereby request that its other nomination be withdrawn.

All property owners have been officially notified of the revised nomination, as evidenced by the attached owner notification letters.

Should you have any questions, or require additional information, please do not hesitate to let me know. As always, I appreciate your cooperation and assistance.

Very truly yours,

WALSH, COLUCCI, LUBELEY, EMRICH & TERPAK, P.C.

Jason B. Heinberg

JBH/lbm

Enclosure

cc: Aaron Liebert, Ruth Hoang, Martin D. Walsh

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### FAIRFAX COUNTY, VIRGINIA 2005 SOUTH COUNTY AREA PLANS REVIEW NOMINATION TO AMEND THE COMPREHENSIVE PLAN

Staff Use Only

	Date Received: Date Accepted: Planning District: Special Area:
SECTION 1: NOMINATOR/AGENT INFORMATION	
Name: Martin D. Walsh for JPI Development, Inc. Daytime Phone: (703) 5	28-4700
Address: 2200 Clarendon Boulevard, 13th Floor, Arlington, Virginia 22201	
Nominator E-mail Address: jheinberg@arl.thelandlawyers.com	
Signature of Nominator (NOTE: There can be only one nominator per nom	ination):
Signature of Owner(s) if applicable: (NOTE: Attach an additional sheet if a either sign the nomination or be sent a certified letter):	necessary. Each owner of a nominated parcel must
Anyone signing on behalf of a business entity, must state the relationship to	that organization below or on an attached page:
SECTION 2: GENERAL INFORMATION	
Check appropriate supervisor district:   Braddock   Lee   Mason   Maso	☑ Mount Vernon □ Springfield
Total number of parcels nominated: 19	
Total aggregate size of all nominated parcels (in acres and square feet): 1.1	<u>55,211</u> sq. ft. <u>26.52</u> acres
Is the nomination a Neighborhood Consolidation Proposal:   Yes	No

SECTION 3: SPECIFIC INFORMATION – Attach either the Specific Information Table found at the end of this application form or a separate 8  $\frac{1}{2}$  x 11 page (landscape format) identifying all the nominated parcels utilizing the format as shown in the Table found at the end of this application.

See Attachment #1
All subject property owners must be sent written notice of the nomination by certified mail unless their signature(s) appears in Section 1 (above).

IMPORTANT NOTE: Any nomination submitted without originals or copies of all the postmarked certified mail receipt(s) and copies of each notification letter and map will not be accepted.

## SECTION 4: CURRENT AND PROPOSED COMPREHENSIVE PLAN DESIGNATIONS

See Section IV, #4, of the Citizen's Guide for instructions.

Current Comprehensive Plan text for nominated property:

Use the Plan on the Web for your citation. It is the most up-to-date. Link: www.fairfaxcounty.gov/dpz/. See Attachment #2

\* Consolidation Option with Areas #3 and

**Residential Land Use Categories** 

\*\* If you are proposing residential densities above 20

du/ac, you must specify a range such as 20-30 du/ac or

Non-mixed Use Options; See Attachment #6

Number of

Units

100

400

Categories expressed in dwelling

1-2 du/ac

 $2-3 \, du/ac$  $3 - 4 \, du/ac$  $4-5 \, du/ac$  $5 - 8 \, du/ac$ 

 $8-12 \, du/ac$ 12 - 16 du/ac

 $16 - 20 \, du/ac$ 20 + du/ac\*\*

30 -40 du/ac.

.1 - .2 du/ac (5-10 acre lots)

.5 - 1 du/ac (1 - 2 acre lots)

.2 - .5 du/ac (2-5 acre lots)

units per acre (du/ac)

Current Plan Map Designation: Residential at 5-8 du/ac; mixed-use option with consolidation.

Proposed Comprehensive Plan Designation: See Attachment #3

\*Consolidation Option with Areas #3 and #6 Mixed Use

If you are proposing Mixed Use, it must be expressed in terms of floor area ratio (FAR). The percentage and intensity/density of the different types of uses must be specific and must equal 100% of the total FAR proposed. The mix and percentage of uses provided by the nominator are what staff and the task force will review. Ranges are not acceptable.

Categories	Percent of
Categories	Total FAR
Office	10%; or
Retail	10%
Public Facility, Gov & Institutional	
Private Recreation/Open Space	
Industrial	
Residential*	90%
TOTAL	100%

<sup>\*</sup> If residential is a component, please provide the approximate number and type of dwelling unit as well as the approximate square footage per unit assumed (i.e., 300 mid-rise multifamily units at 800 square feet per unit). 400 mid-rise multifamily at 1,150 sq. ft. per unit; 100 single-

family attached at 2,500 sq. ft. per unit. SECTION 5: MAP OF SUBJECT PROPERTY

Attach a map clearly outlining in black ink the property of the proposed Plan amendment. The map must be no larger than 8 ½ x 11 inches. Maps in color will not be accepted.

See Attachment #4

#### **SECTION 6: JUSTIFICATION**

Each nomination must conform with the Policy Plan and must meet at least one of the following guidelines. Check the appropriate box and provide a written justification that explains why your nomination should be considered, based on the guidelines below (two-page limit).

See Attachment #5

- ☑ The proposal would better achieve the Plan objectives than what is currently in the adopted Plan.
- ☐ There are oversights or land use related inequities in the adopted Plan that affect the area of concern.

All completed nomination forms must be submitted between July 1, 2005 and September 21, 2005 to: Fairfax County Planning Commission Office Government Center Building, Suite 330 12000 Government Center Parkway Fairfax, Virginia 22035-5505

Attachment 1 Comprehensive Plan Amendment Nomination Owner Listing

Tax Map #	Parcel Address	Owner	Owner Address	Acreage	Certified #
101-3 ((1)) 28	8431 Richmond Highway	Spirit of Faith Ministries c/o Louise Carter	8100 Brown Court Alexandria, Virginia 22306	.818	7004 2510 0006 9900 5042
101-3 ((1)) 29B	8459 Richmond Highway	KGM Property LLC	8459 Richmond Highway Alexandria, Virginia 22309	.981	7004 2510 0006 9900 5059
101-3 ((1)) 29C	None Assigned	Smitty's Lumberteria, Inc.	8457 Richmond Highway Alexandria, Virginia 22309	1.400	7004 2510 0006 9900 5066
101-3 ((1)) 30	8453 Richmond Highway	Smitty's Lumberteria, Inc.	8457 Richmond Highway Alexandria, Virginia 22309	.872	7004 2510 0006 9900 5066
101-3 ((1)) 30B	8457 Richmond Highway	Smitty's Building Supply, Inc.	8457 Richmond Highway Alexandria, Virginia 22309	5.304	7004 2510 0006 9900 5073
101-3 ((1)) 31B	None Assigned	Smitty's Building Supply, Inc.	8457 Richmond Highway Alexandria, Virginia 22309	.594	7004 2510 0006 9900 5073
101-3 ((1)) 30C	8463 Richmond Highway	Master Roofing and Siding, Inc.	P.O. Box 15030 Alexandria, Virginia 22309	1.170	7004 2510 0006 9900 5080
101-3 ((1)) 31C	None Assigned	Engleside Investors II, Inc.	15204 Elk Run Road Chantilly, Virginia 20151	1.727	7004 2510 0006 9900 5097
101-3 ((1)) 32	8501 Richmond Highway	Same	15204 Elk Run Road Chantilly, Virginia 20151	4.253	7004 2510 0006 9900 5097
101-3 ((1)) 33	8515 Richmond Highway	Ray's Trailer Park, LC	6633 Arlington Boulevard Falls Church, Virginia 22042	4.234	7004 2510 0006 9900 5103
101-3 ((9)) (1) 1	None Assigned	Same	6633 Arlington Boulevard Falls Church, Virginia 22042	.500	7004 2510 0006 9900 5103

101-3 ((9)) (1) 2	None Assigned	Same	6633 Arlington Boulevard Falls Church, Virginia 22042	.500	7004 2510 0006 9900 5103	
101-3 ((9)) (1) 3	None Assigned	Same	6633 Arlington Boulevard Falls Church, Virginia 22042	.500	7004 2510 0006 9900 5103	
101-3 ((9)) (1) 4	None Assigned	Same	6633 Arlington Boulevard Falls Church, Virginia 22042	.500	7004 2510 0006 9900 5103	
101-3 ((9)) (1) 5	8543 Forest Place	Hopkins House	1224 Princess Street Alexandria, Virginia 22314	.500	7004 2510 0006 9900 5110	
101-3 ((9)) (1) 501	8537 Forest Place	Same	1224 Princess Street Alexandria, Virginia 22314	1.068	7004 2510 0006 9900 5110	
101-3 ((9)) (1) C1	8539 Richmond Highway	Same	1224 Princess Street Alexandria, Virginia 22314	.229	7004 2510 0006 9900 5110	
101-3 ((9)) (1) 500	8537 Richmond Highway	Suk D. Jang Hyo S. Pang	8537 Richmond Highway Alexandria, Virginia 22309	.282	7004 2510 0006 9900 5127	
101-3 ((9)) (2) B 8541 Richmond	8541 Richmond Highway	Government Center Investments, LLC	119 North Henry Street Alexandria, Virginia 22314	1.148	7004 2510 0006 9900 5134	
2. 17. 6 (1) 11. CO. 100. 1 10. c	WHICH CHISTING GOOD					

**AREA IV** 

Page 54

## SUBURBAN NEIGHBORHOOD AREAS BETWEEN SOUTH COUNTY CENTER CBC AND WOODLAWN CBC

(Refer to Figure 11 for recommendations 1-10)

- 1. This area is located on the west side of Richmond Highway between the southern end of Buckman Road and Blankenship Street and is planned for retail and/or office use up to .35 FAR.
- 2. Potomac Square and Tax Map parcels 101-3((3))1 and 2 are planned for townhouse-style office and/or retail use up to .35 FAR with building heights up to 40 feet.
- 3. The area located on the east side of Richmond Highway south of Potomac Square Center to Parcel 101-3((1))31C north of the Engleside Trailer Park is planned for residential use at 5-8 dwelling units per acre. Residential uses should be designed to provide for a transition to the adjacent single-family residential neighborhood by providing the required buffering and screening to adjacent neighborhoods. No access should be provided to any proposed development from existing streets in the Mount Zephyr community. See recommendation #6 for additional recommendations.
- 4. The area bounded by parcel 101-3((1))7, Blankenship Street, Richmond Highway and Frye Road is planned for residential use at 16-20 du/ac. As an option, the area is planned for mixed use up to 0.50 FAR with consolidation of parcels 101-3((1))8 and 101-3((1))5. The mixed use should consist of predominantly residential use with retail and/or office uses oriented to Richmond Highway.
- 5. The area located on the west side of Richmond Highway between Frye Road and SkyView Drive is planned for community-serving retail use up to .35 FAR and residential use at 2-3 dwelling units per acre, as shown on the Comprehensive Plan map. As an option, residential use at 14-16 dwelling units per acre may be considered if some of the commercially zoned parcels along Richmond Highway are included in the consolidation, subject to the following conditions:
  - Substantial parcel consolidation should be achieved including at least 75 percent of the residentially zoned area. Development at the option level should be considered only if it is in conformance with the guidelines for neighborhood redevelopment contained in Appendix 8 of the Land Use section of the Policy Plan;
  - Residual parcels not included in the initial rezoning under this option may be appropriate for residential use up to 8 dwelling units per acre provided that units are fully integrated and compatible with development, either approved or constructed, under the initial rezoning in terms of unit type, design and architecture;
  - Single-family detached units should be located at the northern end of the area across from the single family detached community along Manor Drive;
  - Effective buffering and screening should be provided by the residential development to screen it from non-residential uses and Richmond Highway. The screening should consist of barriers comprised of brick, masonry, and/or wood;
  - Access should be provided from both Sky View Drive and Frye Road, and these two
    roadways should be interconnected with the internal street system for the residential
    development. There should be no access to Richmond Highway.

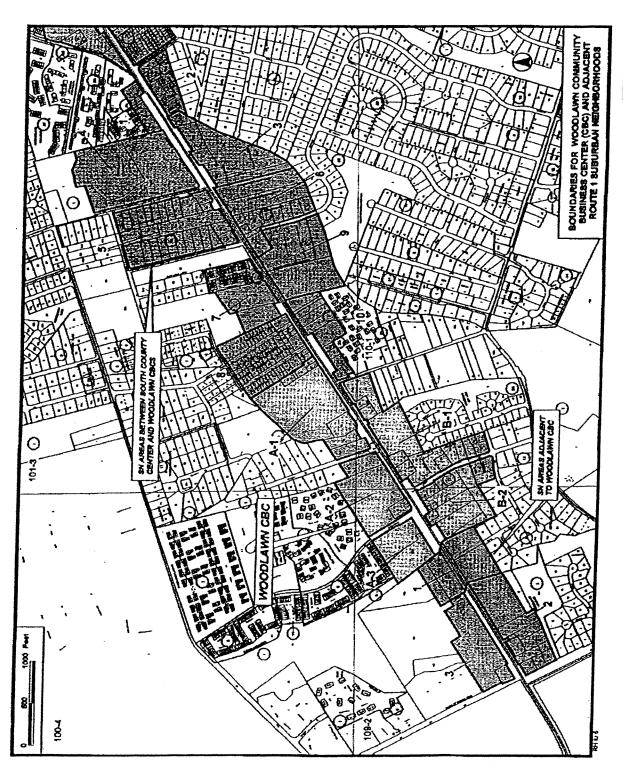
- 6. This area includes the Engleside Trailer Park and Ray's Mobile Colony north of the intersection of Forest Place and Richmond Highway and commercial uses fronting on Richmond Highway. This area is planned for residential use at 5-8 dwelling units per acre. If full consolidation is achieved, this area may be appropriate for a mixed-use development with residential, office and retail uses. At least seventy-five percent of the total development should be developed as residential at 8-12 dwelling units per acre with a component of up to 25 percent of the total site area developed with retail and office uses at an intensity of .35 FAR. Any redevelopment of this area is encouraged to comply with the County's voluntary relocation guidelines. If Areas 3 and 6 are fully consolidated, an option for mixed use including retail and office uses at an intensity up to .50 FAR may be appropriate.
- 7. This area which includes the Knights of Columbus, the U.S. Post Office site, and the Mount Vernon Townes, is located on the north side of Richmond Highway between Osman Drive and east of Highland Lane, and is planned for community-serving retail/office use up to .25 FAR or residential use at 12-16 dwelling units per acre without parcel consolidation. Effective buffering and screening to adjacent residential development, high quality design, and efficient circulation patterns should be provided as part of any development plan.
- 8. This area is located on the west side of Richmond Highway immediately north of Highland Lane to Engleside Shopping Center, between Richmond Highway and Woodlawn Street, and is planned for neighborhood-serving retail and/or neighborhood-serving office use that is residential in character up to .25 FAR for lots fronting Richmond Highway with the remainder planned for residential use at 2-3 du/ac. As on option, the residential portion may be appropriate for use at 5-8 du/ac if Policy Plan guidelines regarding neighborhood consolidation are met. In any development proposal substantial parcel consolidation is encouraged. Access points should be minimized and effective screening and buffering should be provided to the single-family residences located to the north.
- 9. This area is located on the east side of Richmond Highway between Forest Place and the Dominion Virginia Power substation to include the Washington Square Apartments and planned for residential use at 5-8 dwelling units per acre. As an option, retail and/or office uses up to .35 FAR may be appropriate
- 10. This area, located on the east side of Richmond Highway from the Virginia Power substation to Lukens Lane, is planned for residential use at 5-8 dwelling units per acre, retail and/or office use up to .35 FAR.

#### WOODLAWN COMMUNITY BUSINESS CENTER

Figure 11 indicates the geographic location of land use recommendations for this Community Business Center.

The Woodlawn Community Business Center is primarily centered around three shopping centers located on the northwest side of Richmond Highway: Woodlawn Shopping Center, Engleside Plaza and Sacramento Center. On the southeast side of Richmond Highway is an abundance of strip commercial uses including fast food restaurants, auto repair establishments and converted residences. Two small shopping centers, including Cooper Center and Pear Tree Village which offers a well-designed collection of locally-oriented retail and service businesses, are also located on the southeast side of Richmond Highway.





# Proposed Designation--Recommendation #3 (Modify Existing Area #3 Boundary to Exclude Tax Map Parcel 101-3 ((1)) 31C)

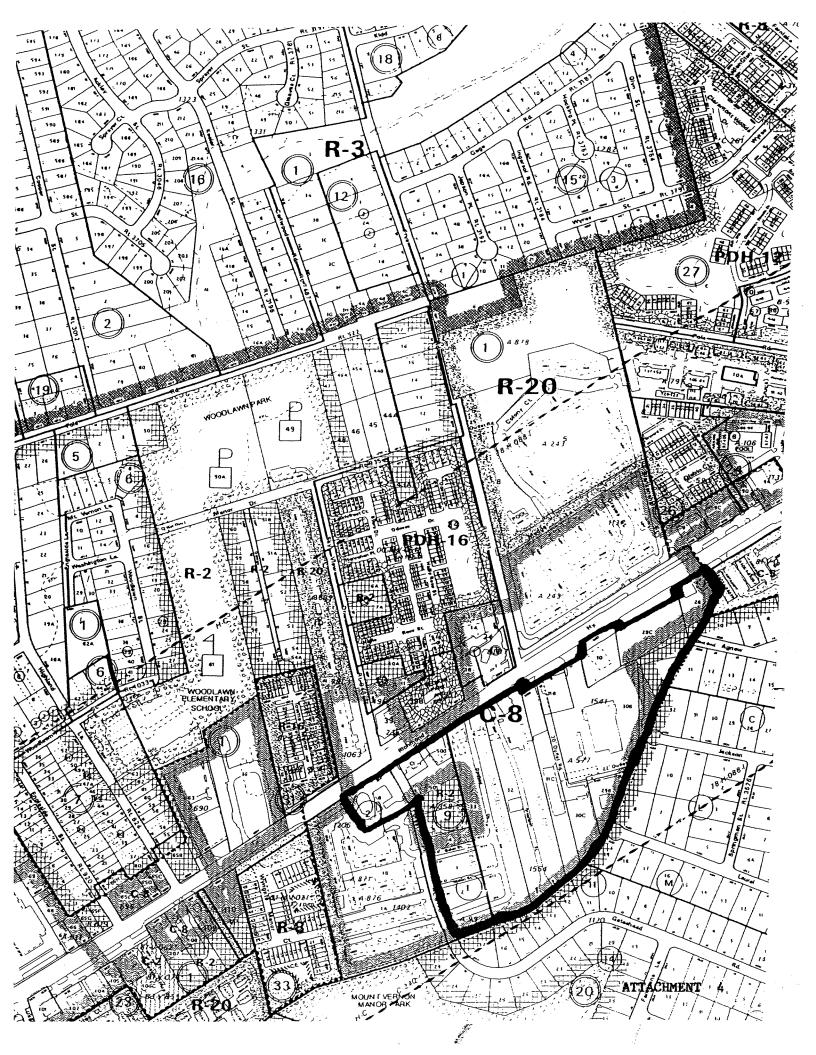
The area located on the east side of Richmond Highway south of Potomac Square Center and north of Parcel 101-3 ((1)) 31C is planned for residential use at a density of sixteen (16) to twenty (20) dwelling units per acre, with logical and substantial parcel consolidation. As an option, residential development, including a small office or retail component, up to .75 FAR is appropriate if logical and substantial consolidation is achieved with the land area identified as recommendation #6. At the option level, building heights should be tapered from seventy-five (75) feet along Richmond Highway to sixty (60) feet adjacent to the lower-density residential communities located to the south and east.

# Proposed Designation--Recommendation #6 (Modify Existing Area #3 Boundary to Include Tax Map Parcel 101-3 ((1)) 31C)

This area includes Ray's Mobile Home Colony north of the intersection of Forest Place and Richmond Highway, the Engleside Trailer Park located on Tax Map parcels 101-3 ((1) 31C and 32, and commercial uses fronting on Richmond Highway. Residential use at ten (10) to twelve (12) dwelling units per acre is recommended on Tax Map parcels 101-3 ((1)) 33; 101-3 ((9)) (1) C1, 1-5, 500, 501; 101-3 ((9)) (2) B with logical and substantial parcel consolidation. If Tax Map parcels 101-3 ((1)) 31C and 32 are further consolidated, residential use at a density of sixteen (16) to twenty (20) du/ac is appropriate. As an option, residential development, including a small office or retail component, up to .75 FAR is appropriate if logical and substantial consolidation is achieved with the land area identified in recommendation #3. At the option level, building heights should be tapered from seventy-five (75) feet along Richmond Highway to sixty (60) feet adjacent to the lower-density residential communities located to the south.

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# Attachment # 5 Justification for Plan Amendment Nomination by Martin D. Walsh on behalf of JPI Development, Inc.

As agent for JPI Development, Inc. (the "Nominator"), I hereby propose a nomination for a Comprehensive Plan Amendment ("Plan Amendment") on the properties identified among the Fairfax County Tax Map Records as 101-3 ((1)) 28, 29B, 29C, 30, 30B, 30C, 31B 31C, 32, 33; 101-3 ((9)) (1) C1, 1-5, 500, 501; 101-3 ((9)) (2) B (the "Subject Property"). The Subject Property is located on the east side of Richmond Highway to the south of the Potomac Square Shops and Offices, northeast of the Washington Square Apartments, and west of the Mt. Vernon Manor and Mt. Zephyr subdivisions. The Subject Property consists of nineteen (19) contiguous parcels which total approximately 26.52 acres predominantly zoned C-8.

The Fairfax County Comprehensive Plan (the "Plan") includes the Subject Property within the Richmond Highway Corridor area of the Mount Vernon Planning District (Area IV). Currently, the Subject Property encompasses the land area identified as recommendation #3 and #6 of the Suburban Neighborhood Areas between the South County Center Community Business Center ("CBC") and the Woodlawn CBC. The Plan text recommends residential use at five (5) to eight (8) dwelling units per acre ("du/ac"). The Plan also provides a mixed-use option for the land area identified in recommendation #6 with residential, office, and retail uses, subject to full consolidation of the land unit. An additional option, with full consolidation of the land area identified as recommendations #3 and #6, permits mixed-use development including retail and office uses at an intensity of .50 FAR.

Two prior nominations applicable to the Subject Property, designated as APR Items # 02-IV-15MV and 17MV, were proposed as part of the 2002 South County Area Plans Review ("2002 South County APR"). These nominations proposed to maintain the base Plan recommendation of residential use at five (5) to eight (8) du/ac. APR # 02-IV-15MV encompassed recommendation #3 (formerly # 19), and proposed to add an option for office, retail, hotel and/or mixed use up to .70 FAR. APR # 02-IV-17MV encompassed recommendation #6 (formerly #21), and proposed to remove the option for higher density residential use with consolidation of the land unit, but to add an option for office, retail, hotel and/or mixed use up to .70 FAR. With full consolidation of the land area identified as recommendations #3 and #6, the nominations proposed an additional option for mixed-use development including residential, office, retail and/or hotel up to 1.0 FAR. Although the Mount Vernon District APR Task Force recommended near unanimous support of APR 02-IV 15MV and 17MV, the nominations were recommended for denial by the Planning Commission and, consequently, were not considered by the Board of Supervisors.

The Subject Property is currently improved with various uses including a lumber yard supply retailer, a place of worship, two (2) mobile home parks and other commercial uses with frontage on Richmond Highway. Intensive residential development is located in proximity to the Subject Property. The Washington Square Apartments located immediately adjacent to the southwest of the Subject Property are zoned C-8 and developed at a density which exceeds 25 du/ac. Other residential developments along Richmond Highway in proximity to the Subject Property are zoned as follows: R-8, R-16, PDH-16 and R-20. The existing pattern of residential development adjacent to Richmond Highway near the Subject Property is generally a higher intensity than the Plan recommendation for the Subject Property, which suggests that the adopted Plan text should be reevaluated.

Recent events unforeseen during the 2002 South County APR have created a change in land use circumstances along the Richmond Highway Corridor, further suggesting that the current Plan guidance for the Subject Property is no longer appropriate. The United States Department of Defense Base Realignment and Closure ("BRAC") recommendations, issued in August of 2005, propose a relocation of

approximately 18,000 workers to Fort Belvoir. If the BRAC recommendations are adopted, as appears likely, these additional jobs will require a reassessment of the Plan recommendations for residential development to supply additional housing opportunities for those working in and around Fort Belvoir. The Fairfax County Board of Supervisors recognized the potential impact of the BRAC recommendations, voting on August 1, 2005 to form a committee to assess potential changes to the Plan that may be necessitated by the influx of new workers and residents to the area. Similarly, this Plan Amendment addresses this change in circumstances in that the proposed residential density will better accommodate the needs of Fairfax County's workers and residents.

The existing Plan recommendations for the Subject Property should be amended to better achieve the Plan's objectives. The Plan recommendation for the Subject Property should be for higher density residential development to be consistent with the existing development pattern and satisfy the growing need for this use in the Richmond Highway Corridor. The Nominator proposes to modify the existing recommendation area boundaries to include Tax Map parcel 101-3 ((1)) 31C within the land area identified as recommendation #6, thereby excluding it from recommendation #3. The Nominator also proposes that the adopted Plan text for the land area identified as recommendation #6 be changed to allow for residential development on Tax Map parcels 101-3 ((1)) 33; 101-3 ((9)) (1) C1, 1-5, 500, 501; and 101-3 ((9)) (2) B at a density of ten (10) to twelve (12) du/ac, with logical and substantial parcel consolidation. If Tax Map parcels 101-3 ((1)) 31C and 32 are further consolidated, residential use at a sixteen (16) to twenty (20) du/ac is appropriate. The Nominator further proposes that the adopted Plan text for recommendation #3 be changed to allow for residential development on Tax Map parcels 101-3 ((1)) 28, 29B, 29C, 30, 30B, 30C and 31B at a density of sixteen (16) to twenty (20) du/ac, with logical and substantial parcel consolidation. As an option, residential development, including a small office or retail component, up to .75 FAR is appropriate if substantial parcel consolidation is achieved between the land area identified as recommendations #3 and #6. At the option level, building heights would be tapered from seventy-five (75) feet along Richmond Highway to sixty (60) feet adjacent to the lowerdensity residential communities located to the south of the Subject Property. The Plan Amendment will create an efficient land use pattern that is compatible with development in the surrounding area.

In addition to being located near a rapidly expanding employment center, the Subject Property is served by local bus service which provides a valuable link to the Huntington Metrorail Station. Thus, the Plan Amendment will also advance numerous specific goals of the Policy Plan and planning objectives for the Richmond Highway Corridor. Specifically, the Plan Amendment satisfies the following objectives:

- Policy Plan, Objective 1: The County's land use plan should provide a clear vision of an attractive, prosperous, and efficient community.
- Policy Plan, Objective 14, Policy b: Encourage infill development in established areas that is compatible with existing and/or planned land use that is at a compatible scale with the surrounding area and that can be supported by adequate public facilities and transportation systems.
- Richmond Highway Planning Objective: Encourage substantial consolidation of contiguous
  parcels starting at the Richmond Highway frontage back to the existing stable residential
  neighborhoods to provide for projects that function in a well-designed, efficient manner and for
  the redevelopment of unconsolidated parcels in conformance with the Area Plan.

In summary, it is submitted that the nomination would better achieve the overall Plan objectives for the Subject Property than what is currently in the adopted Plan, and is in harmony with adjacent development along Richmond Highway.

## Attachment #6 Non-Mixed Use Development Options

### Recommendation Area #3

Parcel(s)	Density Range	Total Units
101-3 ((1)) 33 101-3 ((9)) (1) C1, 1-5, 500, 501 101-3 ((9)) (2) B	10-12 du/ac	80-100
101-3 ((1)) 31C, 32	5-8 du/ac	30-48
(Consolidation) 101-3 ((1)) 31C, 32, 33 101-3 ((9)) (1) C1, 1-5, 500, 501 101-3 ((9)) (2) B	16-20 du/ac	228-286

### Recommendation Area #6

Parcel(s)	Density Range	Total Units
101-3 ((1)) 28, 29B, 29C, 30 30B, 30C, 31B	16-20 du/ac	165-205

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